

July 27, 2000

SENT VIA E-MAIL AND U.S. MAIL

William L. Fishman
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW Suite 300
Washington, DC 20007

Re: D.T.E. 99-271

Dear Mr. Fishman:

Enclosed please find questions to RCN-BecoCom L.L.C. ("RCN") issued by the Department based upon RCN's July 18, 2000, filing in D.T.E. 99-271. Please submit RCN's responses to the Department and the participants in hard copy and by e-mail on or before **5:00 p.m. Thursday, August 3, 2000**. Should you have any questions please contact either Cathy Carpino at (617)305-3622 or Tina Chin at (617)305-3578.

Sincerely,

Cathy Carpino
Hearing Officer

Tina Chin
Hearing Officer

Enc.

cc: DTE 99-271 Service List (w/enc.)

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**QUESTIONS TO RCN-BECOCOM, L.L.C.
D.T.E. 99-271**

The Department of Telecommunications and Energy ("Department") submits to RCN the following Questions.

Instructions

The following instructions apply to this set of Questions and all subsequent Questions issued by the Department to RCN in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if RCN or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If RCN finds that any one of these questions is ambiguous, please notify the hearing officers so that the question may be clarified prior to the preparation of a written

response.

7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; two (2) copies for each hearing officer; and one (1) copy to each member of the participants' service list, including the Department's telecom analysts.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

DEPARTMENT QUESTIONS TO RCN-BECOCOM, L.L.C.
D.T.E. 99-271

1. [Checklist item # 3] See Supplemental Statement of Patrick Musseau:
Provide documentation to support the following claims:
 - a) p. 3: "...costs for make-ready work to correct clearance violations between the communications and safety space on these poles were not assessed to this licensee. These costs and more and [sic] are now being levied on RCN."
 - b) p. 4: "By this time, RCN had documented several instances of make-ready work being unfairly assess to RCN. Then RCN received additional survey billing survey charges from Bell Atlantic in excess of the original survey estimates. These too, by RCN's accounting, were inaccurate."
 - c) p. 4: "Then RCN received additional survey billing survey charges from Bell Atlantic in excess of the original survey estimates. These too, by RCN's accounting, were inaccurate."
 - d) p. 7: "...when in reality Bell Atlantic routinely ignores suggestions by licensees."
 - e) p. 8: "Bell Atlantic changed the procedures for access into these locations which left RCN, and others, without a way to access Bell Atlantic's '0' manholes."
 - f) p. 8: "RCN has to submit additional paperwork and was forced to bear thousands of dollars in additional costs to license conduit beyond our original scope of work."
 - g) p. 8: "RCN was prepared to provide payment for these leases recently but was informed that the results we received were inaccurate and that many sections were no longer available to rent."